

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO., et al.

Plaintiffs,

-against-

Docket No.: CV 12-02157
(KAM)(VMS)

LI-ELLE SERVICE, INC., et al.,

Defendants.

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**NOTICE OF MOTION FOR A DEFAULT JUDGMENT AGAINST DEFAULTING
DEFENDANT LI-ELLE SERVICE, INC.**

PLEASE TAKE NOTICE that Plaintiffs, Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively, "Plaintiffs" or "GEICO") hereby move this Court for an order granting a Default Judgment against Defendant Li-Elle Service, Inc. on Plaintiffs' claims for a declaratory judgment, common law fraud and unjust enrichment, pursuant Rule 55(b)(2) of the Federal Rules of Civil Procedure. In support of its motion, Plaintiff has submitted the August 27, 2012 Declaration of Justin A. Calabrese (and exhibits annexed thereto), the August 15, 2012 Declaration of Jennifer Fogarty and the accompanying August 27, 2012 Memorandum of Law in support, and relies on these documents as well as all of the pleadings and papers on file in this action.

Dated: Uniondale, New York
August 27, 2012

Respectfully submitted,

RIVKIN RADLER LLP

By: 

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